

**REMARKS**

This Amendment, submitted in reply to the Office Action dated July 13, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-3 and 5-10 are all the claims pending in the application.

**I. Claim Rejections under 35 U.S.C. § 112**

Claim 10 stands rejected under 35 U.S.C. § 112, first paragraph, as allegedly containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention.

Applicant respectfully submits that the Examiner's assertion that the Applicant has admitted that "any known MIB browser on the market can operate without the need for preloaded software tools," is a misconstruction of the Applicant's arguments. Applicant did not state that any known MIB browser can operate without the need for preloaded software tools. Rather, Applicant asserted that **an XML language** is understandable by any MIB browser without preloaded software tools.

Second, the Examiner asserts that the claim recitation that the "GUI comprises a Zero Installation Client (ZIC) web-oriented customizable GUI," is lacking in that it is not sufficiently described in the specification to reasonably convey to one skilled in the art that the inventors, at the time the application was filed, had possession of the claimed invention. However, Applicant respectfully submits that the portion of the specification cited by the Examiner (page 2, lines 1-

4), supplemented by the entirety of the specification, would convey to any person skilled in the art that the inventors had possession of the claimed invention. Applicant submits that the claim terminology would be sufficient to convey its meaning to one of skill in the art. However, other parts of the specification discuss the meaning of the claimed language. (See Page 2, Lines 19-33). Accordingly, Applicant respectfully requests that the Examiner withdraw this rejection to claim 10.

Claim 1 stands rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant has amended claim 1 as indicated above. As such, Applicant respectfully requests that the Examiner withdraw this rejection to claim 1.

## **II. Claim Rejections under 35 U.S.C. § 102**

Claims 1-3 and 5-9 stand rejected under 35 U.S.C. § 102(e) as being anticipated by “Specification of a MIB XML for Systems Management” by Soares. Applicant respectfully traverses this rejection.

Claim 1 recites,

“Method for creating a Graphical User Interface (GUI), starting from a protocol dependent Management Information Base (MIB) browser and an Element Manager-Network Manager (EM-NM) interface model, comprising the following steps:

**at an Element Manager Level (EML)**, acting as an HTTP server, making a syntactical conversion from a specific protocol dependent MIB model language into a generic eXtensible Markup Language (XML) model;

retrieving said syntactical conversion from the GUI through a WEB browser, wherein said WEB browser acts as an HTTP client; and

when retrieved, parsing said syntactical conversion by using a **specific XML Scheme**, and

wherein said WEB browser is a **generic manager application which downloads, from said HTTP server, the XML Scheme to be used to decode the syntactical conversion...**

The Examiner asserts that Soares teaches all of the limitations above. Applicant respectfully disagrees. To begin, Soares explicitly states that its “main purpose is showing how to map the information from a MIB to a XML document.” The web application is simply to show the results of that mapping. That being said, it is also clear that the setup in Soares does not disclose the claims.

Claim 1 recites “Method for creating a Graphical User Interface (GUI), starting from a protocol dependent Management Information Base (MIB) browser and an Element Manager-Network Manager (EM-NM) interface model.” However, Soares is not at all concerned with creating a GUI. Soares is merely directed to mapping a MIB to an XML document. Further, there is no teaching or suggestion of an EN-NM interface model in Soares.

Claim 1 further recites “**at an Element Manager Level (EML)**, acting as an HTTP server, making a syntactical conversion from a specific protocol dependent MIB model language into a generic eXtensible Markup Language (XML) model.” The Examiner asserts that the abstract and page 8, left hand paragraph lines 9-13 of Soares, teaches this aspect of the claim. The aspect of Soares cited by the Examiner discloses the mapping from MIB to an XML document. Further, Soares is directed to a solution based on XML for a system open and multi-

platform that allowed the management of heterogeneous systems.

Claim 1 also recites “when retrieved, parsing said syntactical conversion by **using a specific XML Scheme.**” The Examiner asserts that page 6, right hand column lines 4-8 and page 8, left hand column lines 26-29 teaches this aspect of the claim, however, there is no teaching or suggestion of an XML scheme in the aspects of Soares cited by the Examiner let alone, that the syntactical conversion is parsed using a specific eXtensible Markup Language (XML) Scheme.

Soares contains a definition of a MIB (see page 242, paragraph 3. Proposed MIB). Specifically, Soares discloses that an MIB is a structure that CONTAINS the necessary variables to monitor or to manage the components in a net. It appears that standard tools are activated on specific agents. The technical problem to be solved by an exemplary embodiment of the present invention is allowing a personal computer or a work station to operate as a network manager, without the need to have preloaded software tools.

According to an exemplary embodiment of the present invention, the EML makes a syntactical conversion from specific protocol dependent Management Information Base model language into a generic eXtensible Markup Language. Similarly, when a user connects (through the user’s computer) to a web page of any internet site, the user receives all the information for manipulating the downloaded web page. There is no specific preloaded software in the user computer for manipulating the page.

Such an XML language is understandable by a MIB browser presently on the market. Therefore, a personal computer or a work station can operate as a network manager, without the

need to have preloaded software tools. Soares has nothing to do with the present invention, therefore Soares does not teach or suggest the claimed elements.

Further, there is no teaching of “a **generic manager application** which **downloads**, from **said HTTP server**, the XML Scheme to be used to decode the syntactical conversion.” The cited portion of Soares just simply does not disclose this. First, Soares explicitly discloses that the demonstration application is not necessarily a generic manager application. Specifically, the web application was utilized by “Internet browser Explorer 5.5.” However, the web application was not also capable of being used for Netscape as this would have required verification of which methods and properties of DOM . . . object are available for this browser. (Soares, P. 6, Left Column). Further, it is not taught that the XML scheme is downloaded by the Web Browser. The Examiner asserts that that this would have been apparent to one of skill in the art. However, it would be entirely possible that the XML scheme might need to be preloaded onto the client computer. This is entirely unclear from Soares and would not have been inherent. As such, Soares cannot be said to teach every limitation of the claims.

Further, Soares appears to teach away from the present invention. Soares does not employ the functionalities of an HTTP server which could be in an agent, for downloading on the manager all the information, software included, for managing the agent itself. As discussed above, Soares defines a MIB as a structure that CONTAINS the necessary variables to monitor or to manage the components in a net. Since there is the possibility to create a specific GUI using JAVA which is loaded over the controlled object, it is permitted to control a network entity, independently from the belonging layer, with a personal computer or work station,

equipped with a commercial WEB browser (Netscape®, Windows Explorer®, Opera®, etc.). This approach may implicitly create an abstraction with the technology that it has to manage. In fact, XML methodology could be easily mapped into another language (WML for interface WAP clients, etc.) technology specific.

For at least the above reasons, claim 1 and its dependent claims should be deemed allowable.

**Claim 2**

Claim 2 recites “wherein said WEB browser further comprises: displaying a MIB representation provided by an agent application, thereby implementing an HTTP server side of a network device or of a manager communication channel.” The Examiner asserts that page 5, section 5, line 10 to page 6, line 1, teaches this aspect of the claim. The aspects of Soares cited by the Examiner disclose two microcomputers interlinked. One of the computers was designated to be an XML agent therefore, the HTTP services was configured in a Linux environment. This enables other computers access through the use of this protocol using a navigation browser through the Internet. However, there does not appear to be any teaching or suggestion that a web browser displays the MIB representation provided by an agent application.

For at least the above reasons, claim 2 should be deemed allowable.

**III. Claim Rejections under 35 U.S.C. § 103**

Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over “Specification of a MIB XML for Systems Management” by Soares in view of Applicant’s admission.

First, as discussed above with regard to the 35 U.S.C. § 112 rejection of claim 10, Applicant submits that the Examiner has misunderstood the Applicant's statement. Applicant did not state that any known MIB browser can operate without the need for preloaded software tools. Rather, Applicant asserted that **an XML language** is understandable by any MIB browser without preloaded software tools.

Second, Applicant submits that Soares does not at any point discuss that a "GUI comprises a Zero Installation Client (ZIC) web-oriented customizable GUI." As such, Applicant respectfully requests that the Examiner withdraw the rejection to claim 10.

### **III. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116  
U.S. Application No. 10/721,349

**Attorney Docket No. Q78653**

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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